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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for

the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0627

Comment submitted by J. Surkamp

Submitter Information

Submitter's Representative: Jim Surkamp

General Comment

Speaking for myself having attended the meetings and listened much, I doubt the precision and reliability of the scientific data that had been ballyhooed at the Martinsburg in the meeting I attended from land grant universities. Those revisions have undergone independent scientific peer reviews, sponsored by the CBP's STAC, before review and approval by the CBP's Criteria Assessment Protocols Workgroup and then the Water Quality Steering Committee/Water Quality Implementation Team for EPA publication on behalf of the partnership.

We are eighty per cent karst in Jefferson County and the state WV DEP has little real knowledge in terms of how to treat discharges in our soil type, since we are one of the few counties this way.

The stringent TMDL levels especially for phosphorus might be a goad to ban phosphorus which might be worth trying.

But this project was launched before the economic downturn of late 2008 -